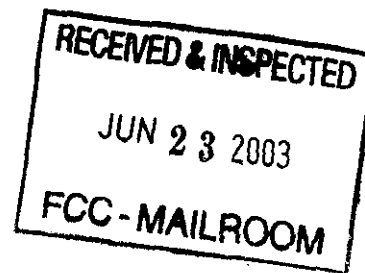


DOCKET FILE COPY ORIGINAL



June 17, 2003

Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby - TW - A325  
Washington, D.C. 20554

Re: Petition for Rule Making  
Karnes City, Texas

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of a Petition  
for Rule Making to add Channel 237A at Karnes City, Texas.

Respectfully submitted,

A handwritten signature in black ink, appearing to be "Charles Crawford", written over a horizontal line.

Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205  
(214) 520-7077 Tele  
(214) 443-9308 Fax

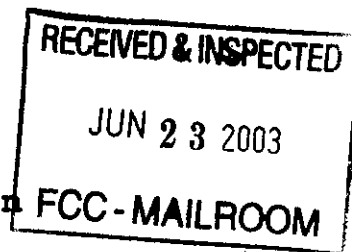
KarnesCover

No. of Copies rec'd 074  
List ABOVE

MB

03-170

Before the  
Federal Communications Commission  
Washington, D.C. 20554



In the Matter of )  
 )  
Amendment of 73.202 (b) ) MB Docket No. \_\_\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Karnes City, Texas )

To: John Karousos, Assistant Chief  
Audio Division of the  
Media Bureau

PETITION FOR RULE MAKING

Pursuant to 47 C.F.R. 1.401, Charles Crawford respectfully petitions the FCC to institute a Rule Making proceeding to amend the FM Table of Allotments to add Channel 237A at Karnes City, Texas.

DISCUSSION

Petitioner respectfully submits that the public interest would be served by allocating Channel 237A to Karnes City, Texas as that community's first competing FM service.<sup>1</sup> Karnes City is an incorporated community with its own zip code and a population of 3,457 persons.<sup>2</sup> One hundred and thirty four (134) businesses in Karnes City have been given a credit rating by Dun & Bradstreet as of the last quarter of 2000 according to the Texas Almanac 2002/ 2003. Karnes City has its own Mayor, Nathen Schulz, its own school system, its own fire department, police department, post office, city offices and a number of local churches. Karnes City is a community that is certainly deserving of a competing FM service. The proposed channel 237A will provide additional diversity and an outlet for local self-expression to Karnes City residents and therefore is in the public interest.

---

<sup>1</sup> KTXS(FM), Channel 276C2 is currently licensed to Karnes City, Texas.  
<sup>2</sup> Texas Almanac 2002/2003.

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JUN 23 2003  
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In order for Channel 237A to be allotted at Karnes City, Texas, station KZFM Channel 238C in Corpus Christi, Texas will need to be reclassified to a C0. Pursuant to MM Docket 98-93, I am making a formal request for station KZFM in Corpus Christi to be reclassified from a C to a C0. (See, Attachment A, Request to Reclassify statement)

Attached hereto is a channel study confirming that Channel 237A can be allocated to Corpus Christi, Texas, consistent with the FCC's FM separation rules, provided 238C in Corpus Christi is reclassified to a C0. See revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1992). (See, Attachment B)

Reference coordinates for Channel 237A at Karnes City, Texas are:

29 00 18 N  
97 50 50 W

Should this petition be granted and Channel 237A be allotted to Karnes City, Texas, Petitioner will apply for Channel 237A at Karnes City and after it is authorized, will promptly construct the new facility.

The factual information provided in this Petition for Rule Making is correct and true to the best of my knowledge.

Respectfully submitted,



Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205  
(214) 520-7077      Tele  
(214) 443-9308      Fax

cc: Gene A. Bechtel, Law Office of Gene Bechtel, Suite 600, 1050 17<sup>th</sup> Street, N.W., Washington, D.C. 20036, telephone (202) 496-1289, telecopier (301) 762-0156, attorney for Charles Crawford. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as Charles Crawford.

June 17, 2003

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**Attachment A**

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Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205

Petition for Rule Making  
FM Channel 237A  
Karnes City, Texas  
June 17, 2003

### Attachment A

Request to Reclassify  
Station KZFM(FM), Corpus Christi, Texas  
Pursuant to MM Docket 98-93

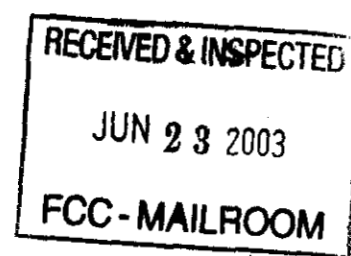
Radio Station KZFM(FM), Corpus Christi, Texas is licensed to Malkan FM Associates, P.O. Box 9757, Corpus Christi, Texas 78469. (Facility ID 39716), FCC File No. BLH 19871029KD. The facility operates with a power of 100 kilowatts with center of radiation 303 meters height above average terrain. The above captioned Docket 98-93 provides the mechanism to automatically downgrade a Class C facility to Class C0 when a demand is made for the spectrum, as is the case here. Charles Crawford respectfully requests that the license of Radio Station KZFM(FM) be modified to specify operation on FM Channel 238C0 instead of on FM Channel 238C in accordance with the above Docket which provides for such downgrades when a demand for the unused spectrum is made, as is the case here.

Charles Crawford, the proponent of Channel 237A/ Karnes City, Texas, in accordance with the above Docket, formally requests that the Commission reclassify Radio Station KZFM(FM) as a Class C0 facility. Charles Crawford certifies that no alternative channel is available for the service he proposes at Karnes City, Texas as is proposed in the Petition for Rule Making. A copy of this Petition for Rule Making is being served on Malkan FM Associates, as is required in the above Docket.



Charles Crawford

Attachment B

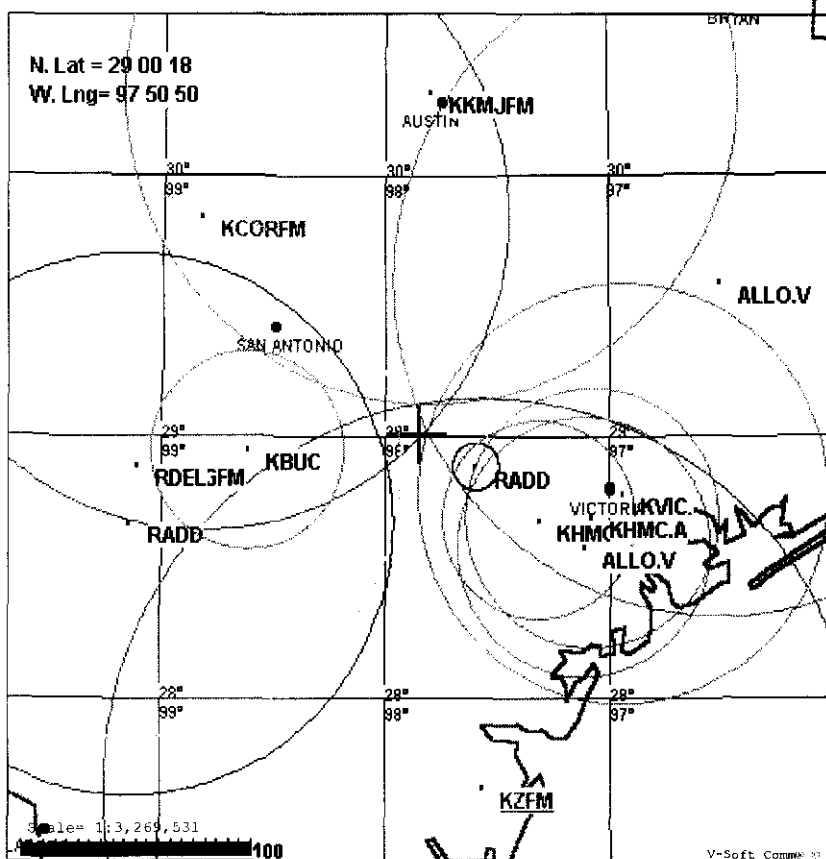


FM PROSP<sup>(TM)</sup> LOCATE STUDY CH 237 A 95.3 MHz  
Study

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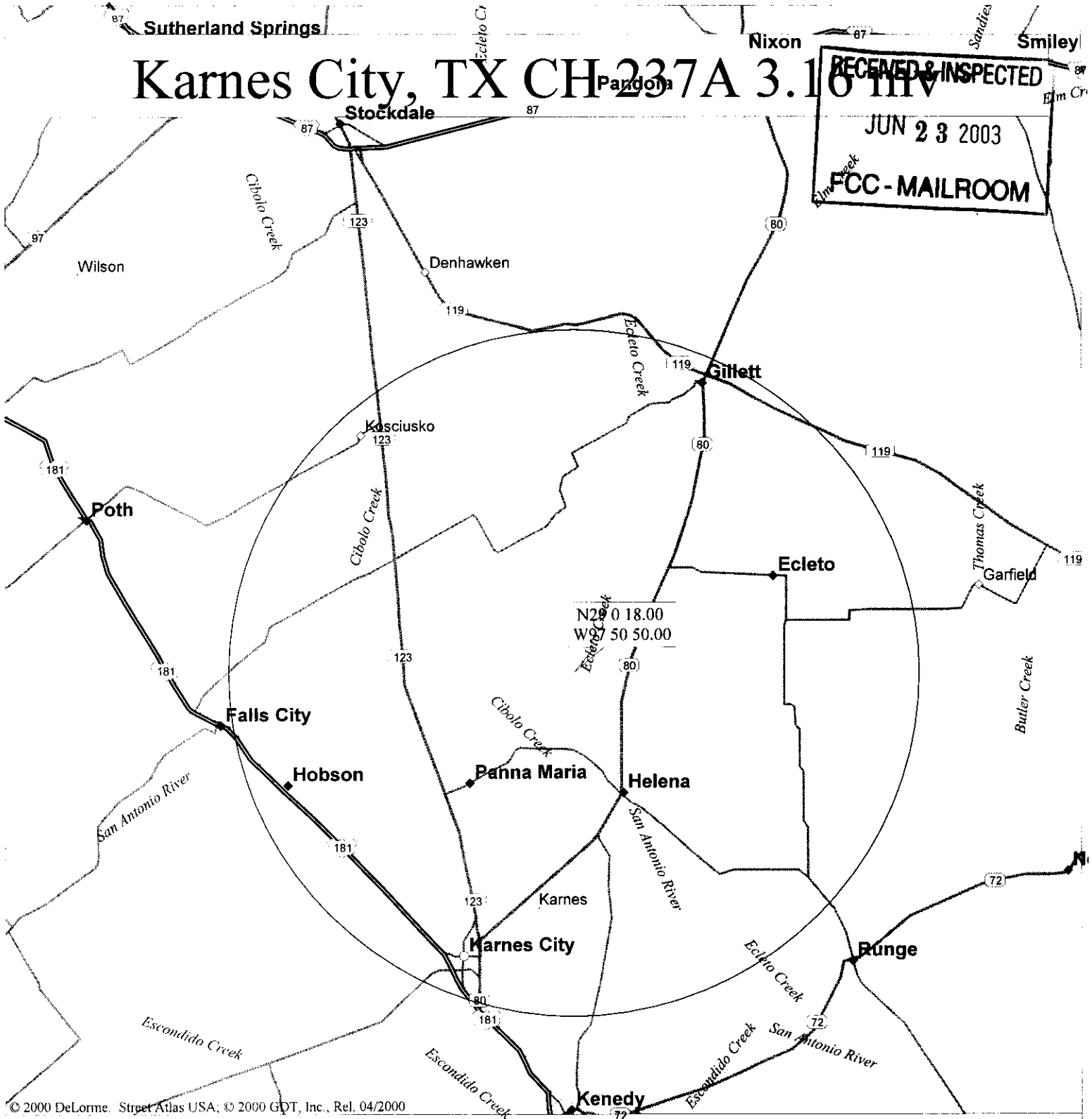


Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
KZFM	238C*	LIC-D	Corpus Christi	TX	151.64	169.6	165.0	-13.36
KCORFM	236C1	LIC N	Comfort	TX	132.63	314.7	133.0	-0.37
RDEL	236C3	DEL	Victoria	TX	91.75	105.5	89.0	2.75
KVIC	236C3	LIC	Victoria	TX	91.75	105.5	89.0	2.75
ALLO.V	237C3	VAC	Eagle Lake	TX	145.88	63.3	142.0	3.88
KVWGFM	237A	LIC N	Pearsall	TX	123.91	264.2	115.0	8.91
RDEL	237A	DEL	Pearsall	TX	123.91	264.2	115.0	8.91
KKMJFM	238C1	LIC	Austin	TX	146.17	1.8	133.0	13.17
RADD	237A	ADD	Dilley	TX	131.95	253.7	115.0	16.95
RADD	291A	ADD	Yorktown	TX	27.91	118.2	10.0	17.91
KHMC	240C3	LIC-Z	Goliad	TX	63.14	124.5	42.0	21.14
KHMC.A	240C2	APP-Z	Goliad	TX	82.72	114.9	55.0	27.72
ALLO.V	240C2	VAC	Goliad	TX	85.74	123.4	55.0	30.74
KBUC	239C3	LIC	Jourdanton	TX	75.38	265.5	42.0	33.38



# Karnes City, TX CH 237A 3.16

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Mag 11.00

Tue Jun 17 12:13 2003

Scale 1:250,000 (at center)

5 Miles

5 KM

-  US Highway
-  Major Connector
-  State Route
-  County Seat
-  Small Town
-  Locale
-  Water
-  River/Canal

Intermittent River


**CERTIFICATE OF SERVICE**

I, Charles Crawford, hereby certify that on this 17<sup>th</sup> day of June, 2003, I caused copies of the foregoing "Petition for Rule making for Karnes City, Texas" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:

Ms. Marlene Dortch  
Office of the Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
12<sup>th</sup> Street Lobby-TW-A325  
Washington, D.C. 20554

Gene Bechtel, Esq.  
Law Offices of Gene Bechtel, P.C.  
1050 17<sup>th</sup> Street, N.W., Suite 600  
Washington, D.C. 20036-5517  
(Counsel for Petitioner)

Malkan FM Associates  
Station KZFM  
P.O. Box 9757  
Corpus Christi, Texas 78469

  
\_\_\_\_\_  
Charles Crawford